LONG & LEVIT LLP

ATTORNEYS AND COUNSELORS AT LAW

Jessica R, MacGregor Partner

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December 22, 2017

S1380.061

VIA E-MAIL AND U.S. MAIL

Christopher Stoller 415 Wesley, Apt. 1 Oak Park, IL 60302 cns40@hotmail.com

Re: Stoller v. JAMS, et al., No. 2017 L 001177

(Circuit Court of DuPage County, Illinois, filed October 24, 2017)

Dear Mr. Stoller:

On December 18, 2017, you filed a Notice of Affidavit of Service and Summons in which you incorrectly aver that I agreed to accept service of process on behalf of JAMS Judge Goldberg and Mr. McCants. As is made perfectly clear in the attached email, your statement is incorrect. I have told you repeatedly that I will agree to accept service of process via a Notice and Acknowledgment of Receipt. I even provided you with the form. Instead of sending it to me, you attempt to create service by making inaccurate statements repeatedly.

Your affidavit runs afoul of Illinois Rule of Civil Procedure 137, which provides that a party's signature on a pleading is his representation that it is "well grounded in fact" and is not filed for "any improper purpose, such as to harass or to cause unnecessary delay or needless cost of litigation." Making a statement you know to be inaccurate – that I broadly agreed to accept service of process – is a clear violation of the Rule.

Please immediately withdraw the Affidavit. If my clients are forced to move to quash or take any other action as a result of your improper filing, they will pursue all rights and remedies available to them.

Very truly yours,

Jessiea R. MacGregor

Enclosure

cc:

Leo Stoller (<u>ldms4@hotmail.com</u>) (w/enclosures)

Philip Kiss (philip kiss@comcast.net) (w/enclosures)

Emily Kesler (ekesler@seyfarth.com) (w/enclosures)

Jordan P. Vick (jvick@seyfarth.com) (w/enclosures)

From:

MacGregor, Jessica

Sent:

Friday, December 08, 2017 11:22 AM

To:

C S

Subject:

RE: Stoller: Notice and Acknowledgement

Dear Chris:

Where I have agreed to accept service of process via a Notice and Acknowledgement and given you the form, it seems unnecessary to resort to the sort of baseless threats you make below. Should you follow through on them we will have no choice but to seek all appropriate remedies.

But it is my hope you will do the right thing: simply send me a code-compliant Notice and Acknowledgment (providing 30 days from the date of notice to return the Acknowledgement and 60 days from the date of notice to respond to the complaint).

Best,

Jessica

From: C S [mailto:cns40@hotmail.com]
Sent: Friday, December 08, 2017 11:16 AM

To: MacGregor, Jessica

Subject: Re: Stoller: Notice and Acknowledgement

Dear Jessica, 12/8/17

Your email today of December 8, 2017 is self-serving and made up of material miss statement of fact. I intend on filing an attorney disbarment complaint with the state Bar of California against you and your partners. You will have your opportunity to explain your position at the default hearing to the court in DuPage county Illinois.

Act Accordingly,
Christopher N. Stoller Ed
Americans for the enforcement of attorney ethics

On Dec 8, 2017, at 12:22 PM, MacGregor, Jessica < imacgregor@longlevit.com > wrote:

Dear Chris:

Following up on our call just now. You told me you filed an Amended Complaint today. I told you I would accept service of process via a Notice and Acknowledgment of Receipt that complies with Illinois code. I had previously sent you a form that does and attach it again here.

You stated that by sending me the amended complaint via email, you believed JAMS, the arbitrator and the case manager will have been served and their response will be due within 28 days. I told you I had NOT agreed to accept service by email and that the only method of service I agreed to was via a proper Notice and Acknowledgment.

Best,

Jessica

From: MacGregor, Jessica

Sent: Tuesday, November 28, 2017 11:24 AM

To: cns40@hotmail.com

Subject: Stoller: Notice and Acknowledgement

Dear Chris:

I attach the Notice and Acknowledgement Form which follows Illinois code. You need to fill in the amount in controversy and sign and date the "Notice" part of the form. Then you send it to me and I will sign and return the "Acknowledgment" part of the form.

Best,

Jessica

Jessica Rudin MacGregor Partner

Long & Levit llp

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